

LETTER OF REQUEST COMMISSION ROGATOIRE

**Hague Convention of 18 March 1970 on the
Taking of Evidence Abroad in Civil or Commercial Matters**
*Convention de La Haye du 18 mars 1970 sur
l'obtention des preuves à l'étranger en matière civile ou commerciale*

1.	Sender <i>Expéditeur</i>	Robert A. Delafield II, Nelson Bumgardner Conroy PC 3131 West 7th St., Suite 300, Fort Worth, TX 76107 USA (With the permission of the Requesting Authority)
2.	Central Authority of the Requested State <i>Autorité centrale de l'État requis</i>	Ministry of Justice of China, International Legal Cooperation Center 33, Pinganli Xidajie, Xicheng District, Beijing 100035, China
3.	Person to whom the executed request is to be returned <i>Personne à qui les pièces constatant l'exécution de la demande doivent être renvoyées</i>	Clerk US District Court for the Western District of Texas 800 Franklin Ave., Rm. 380, Waco, TX 76701 USA
4.	Specification of the date by which the requesting authority requires receipt of the response to the Letter of Request <i>Indiquer la date limite à laquelle l'autorité requérante désire recevoir la réponse à la commission rogatoire</i>	
	Date <i>Date limite</i>	May 13, 2022.
	Reason for urgency* <i>Raison de l'urgence</i>	The trial is scheduled to begin on June 13, 2022.

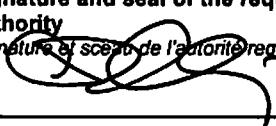
In conformity with Article 3 of the Convention, the undersigned applicant has the honour to submit the following request:

En conformité de l'article 3 de la Convention, le requérant soussigné a l'honneur de présenter la demande suivante :

5. a	Requesting authority <i>(Art. 3(a))</i> <i>Autorité requérante</i> <i>(art. 3(a))</i>	United States District Court for the Western District of Texas
b	To the Competent Authority of <i>(Art. 3(a))</i> <i>À l'Autorité compétente de</i> <i>(art. 3(a))</i>	The People's Republic of China
c	Names of the case and any identifying number <i>Nom de l'affaire et numéro d'identification de l'affaire</i>	Unification Technologies LLC v. Micron Technology, Inc., et al., Civ. A. No. 6:20-CV-500

6.	Names and addresses of the parties and their representatives (including representatives in the Requested State*) (Art. 3(b)) <i>Identité et adresse des parties et de leurs représentants (y compris représentants dans l'État requis) (art. 3(b))</i>	
a	Plaintiff <i>Demandeur</i>	Unification Technologies LLC
	Representatives <i>Représentants</i>	See Attachment A
b	Defendant <i>Défendeur</i>	Micron Technology, Inc., Micron Semiconductor Products, Inc., and Micron Technology Texas LLC

c	Representatives <i>Représentants</i>	See Attachment A
	Other parties <i>Autres parties</i>	Not Applicable
	Representatives <i>Représentants</i>	Not Applicable
7. a	Nature of the proceedings (divorce, paternity, breach of contract, product liability, etc.) (Art. 3(c)) <i>Nature et objet de l'instance</i> (divorce, filiation, rupture de contrat, responsabilité du fait des produits, etc.) (art. 3(c))	Civil action seeking damages for patent infringement.
	Summary of complaint <i>Exposé sommaire de la demande</i>	See Attachment B
	Summary of defence and counterclaim* <i>Exposé sommaire de la défense ou demande reconventionnelle</i>	See Attachment B
	Other necessary information or documents* <i>Autres renseignements ou documents Utiles</i>	A copy of the complaint and the answer are attached to this request.
8. a	Evidence to be obtained or other judicial act to be performed (Art. 3(d)) <i>Actes d'instruction ou autres actes judiciaires à accomplir</i> (art. 3(d))	The Requesting Authority requests that the competent authorities of the People's Republic of China compel the production of documents and compel the testimony specified on Attachment C.
	Purpose of the evidence or judicial act sought <i>But des actes à accomplir</i>	The evidence sought is relevant to proof of patent infringement.
9.	Identity and address of any person to be examined (Art. 3(e))* <i>Identité et adresse des personnes à entendre</i> (art. 3(e))	Memblaze Technology Co., Ltd., Building B2, Dongsheng Park, 66 Xixiaokou Rd., Haidan District, Beijing 100192, China
10.	Questions to be put to the persons to be examined or statement of the subject matter about which they are to be examined (Art. 3(f))* <i>Questions à poser ou faits sur lesquels les personnes susvisées doivent être entendues</i> (art. 3(f))	See Attachment C
11.	Documents or other property to be inspected (Art. 3(g))* <i>Documents ou objets à examiner</i> (art. 3(g))	See Attachment C

12.	Any requirement that the evidence be given on oath or affirmation and any special form to be used (Art. 3(h))* <i>Demande de recevoir la déposition sous serment ou avec affirmation et, le cas échéant, indication de la formule à utiliser (art. 3(h))</i>	The testimony should be given on oath. No particular form is required.
13.	Special methods or procedure to be followed (e.g., oral or in writing, verbatim transcript or summary, cross-examination, etc.) (Arts 3(i) and 9)* <i>Formes spéciales demandées (déposition orale ou écrite, procès-verbal sommaire ou intégral, "cross-examination", etc.) (art. 3(i) et 9)</i>	See Attachment D
14.	Request for notification of the time and place for the execution of the Request and identity and address of any person to be notified (Art. 7)* <i>Demande de notification de la date et du lieu de l'exécution de la requête, de l'identité et de l'adresse de la ou des personnes à informer (art. 7)</i>	The Requesting Authority requests that the representatives of the parties identified on Attachment A be given advance notice of all proceedings related to execution of the letter of request by email at the addresses given on the Attachment.
15.	Request for attendance or participation of judicial personnel of the requesting authority at the execution of the Letter of Request (Art. 8)* <i>Demande d'assistance ou de participation des magistrats de l'autorité requérante à l'exécution de la commission rogatoire (art. 8)</i>	Not Applicable
16.	Specification of privilege or duty to refuse to give evidence under the law of the Requesting State (Art. 11(b))* <i>Spécification des dispenses ou interdictions de déposer prévues par la loi de l'Etat requérant (art. 11(b))</i>	The witness may refuse to give evidence if it has a privilege under the law of the United States or the law of China. Privileges under US law include the attorney-client privilege and, for natural persons, the privilege against self-incrimination.
17.	The fees and costs incurred which are reimbursable under the second paragraph of Article 14 or under Article 26 of the Convention will be borne by:* <i>Les taxes et frais donnant lieu à remboursement en vertu de l'article 14, alinéa 2 et de l'article 26 seront réglés par :</i>	The plaintiff, Unification Technologies LLC.
Date of request <i>Date de la requête</i>		<i>11/2/2021</i>
Signature and seal of the requesting authority <i>Signature et sceau de l'autorité requérante</i>		

*Omit if not applicable / Ne remplir qu'en cas de nécessité